

# NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

Attorneys at Law

Leon L. Nowalsky  
Benjamin W. Bronston  
Edward P. Gothard

3500 North Causeway Boulevard  
Suite 1442  
Metairie, Louisiana 70002  
Telephone: (504) 832-1984  
Facsimile: (504) 831-0892

Monica Borne Haab  
Philip R. Adams, Jr.

---

Of Counsel  
Bruce C. Betzer

February 6, 2006

*Via FCC ECFS System  
Electronic Filing*

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: FCC Docket EB 06-36  
EB-06-TC-060  
Reduced Rate Long Distance, LLC

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached Reduced Rate Long Distance, LLC ("Company") annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of the Company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,



Leon L. Nowalsky

LLN/rps

**ANNUAL STATEMENT OF COMPLIANCE AS REQUIRED BY  
SECTION 64.2009(C) OF THE RULES AND REGULATIONS OF THE  
FEDERAL COMMUNICATIONS COMMISSION**

Reduced Rate Long Distance, LLC (the "Company") has identified three distinct department of its business that, on a daily basis, handle customer proprietary network information ("CPNI") namely: Billing, Engineering and Customer Service. The directors of each department identify specific individuals who work in their departments that physically handle CPNI. The directors and those individuals are educated by the Company concerning Section 222 of the Communications Act of 1934 and the requirements therein.

The education entails: (1) identifying specific customer information that must remain secure, such as usage amounts, calling patterns and customer specific network design; (2) the proper use, storage and dissemination of this information; and (3) inquiring when doubt exists regarding a type of information that has not been previously discussed.

In addition to education, the Company uses proprietary security codes to internally identify its customers. Without the master code sheet, customers of the Company appear solely as a number. If information is accidentally released, the information is not readily identifiable to a specific customer without the code sheet.

Only the department directors and the corporate officers of the Company possess the code sheet and dissemination of the sheet is strictly prohibited.

The Company believes that the combination of education and coding of customer identities provides sufficient security for CPNI.

**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY SECTION 64.2009(E)  
OF THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATION  
COMMISSION**

I, Robert Sorrentino, am President of Reduced Rate Long Distance, LLC ("Company") and in that capacity I have personal knowledge of the operations of the Company, that the Company has established operating procedures that are adequate to safeguard its customer proprietary network information and, in support of this Certificate, Company has attached a Statement explaining its operating procedures to ensure compliance with the rules as set forth in 47 CFR Ch. 1 § 64.2009.

Robert Sorrentino / rsh  
Signature

ROBERT SORRENTINO  
Printed Name

2-6-06  
Date